

# EXHIBIT D

# ***EXHIBIT B***

**CONFIDENTIAL - ATTORNEYS' EYES ONLY**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

_____	§	
UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 2:17-cv-00258-JRG
Plaintiffs,	§	
	§	
v.	§	
	§	
APPLE INC.,	§	
Defendant.	§	
_____	§	

**PLAINTIFFS' RESPONSES TO APPLE INC.'S  
VENUE-RELATED INTERROGATORIES**

Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A., Inc. ("Uniloc" or "Plaintiffs") responds to Defendant Apple Inc.'s Venue-Related Interrogatories as follows:

**RESPONSES**

**INTERROGATORY NO. 1:**

For each Uniloc officer, member, manager, agent, or employee who resides, works, or conducts business within either or both of the states of California and Texas, and whom Uniloc contends has information relevant to the Patents-in-Suit or to Uniloc's claims in this case, state that individual's name, title, job description, the general subject matter or categories of the relevant information he or she is alleged to possess, and all cities or towns where that individual resides and/or works.

**RESPONSE TO INTERROGATORY NO. 1:**

Sean Burdick is the President and General Counsel for Uniloc USA, Inc. Mr. Burdick resides in Plano, Texas. Mr. Burdick has worked in Plano, Texas, Boise, Idaho, and Newport Beach, California. Mr. Burdick prosecuted the Patents-in-Suit and has general knowledge regarding intellectual property for Uniloc USA, Inc.

Craig Etchegoyen is a Director of Uniloc Luxembourg S.A. Mr. Etchegoyen resides outside of Kona on the island of Hawaii. Mr. Etchegoyen has worked in Kona, Hawaii, Plano,

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Texas and Newport Beach, California. Mr. Etchegoyen is the inventor of the Patents-in-Suit and has general knowledge regarding intellectual property for Uniloc Luxembourg, S.A.

INTERROGATORY NO. 2:

If any individual identified in response to Interrogatory No. 1 resides or works at more than one location, state the approximate percentage of time that each such individual has resided or worked at each such location for each of the past three calendar years.

RESPONSE TO INTERROGATORY NO. 2:

In 2017, Mr. Burdick has worked about 1/3 of his time in Plano, Texas, about 1/3 of his time in Boise, Idaho, and about 1/3 of his time in Newport Beach and Irvine, California.

In 2016, Mr. Burdick worked about 1/3 of his time in Plano, Texas, about 1/3 of his time in Boise, Idaho, and about 1/3 of his time in Irvine, California.

In 2015, Mr. Burdick worked about 1/3 of his time in Plano, Texas, about 1/3 of his time in Boise, Idaho, and about 1/3 of his time in Irvine, California.

In 2017, Mr. Etchegoyen worked about 60% of his time in Kona, Hawaii, about 20% of his time in Plano, Texas, and about 20% of his time in Newport Beach and Irvine, California.

In 2016, Mr. Etchegoyen worked about 60% of his time in Kona, Hawaii, about 20% of his time in Plano, Texas, and about 20% of his time in Irvine, California.

In 2015, Mr. Etchegoyen worked about 60% of his time in Kona, Hawaii, about 20% of his time in Plano, Texas, and about 20% of his time in Irvine, California.